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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Bankruptcy Case No. 19-30088 (DM)

In re:

Chapter 11 (Lead Case) (Jointly Administered)

PG&E CORPORATION,

**DECLARATION OF THOMAS B. RUPP IN
SUPPORT OF *EX PARTE* MOTION OF DEBTORS
PURSUANT TO B.L.R. 9006-1 REQUESTING
ORDER SHORTENING TIME FOR HEARING TO
CONSIDER APPLICATIONS OF DEBTORS TO
RETAIN AND EMPLOY PILLSBURY
WINTHROP SHAW PITTMAN LLP AND
CLARENCE DYER & COHEN LLP PURSUANT
TO 11 U.S.C. § 327(e) AND FED. R. BANKR. P.
2014(a) AND 2016 AND THE ORDER
AUTHORIZING THE DEBTORS TO EMPLOY
PROFESSIONALS USED IN THE ORDINARY
COURSE OF BUSINESS**

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

[No hearing requested]

1 I, Thomas B. Rupp, pursuant to section 1746 of title 28 of the United States Code,
2 hereby declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information, and belief:

4 1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, a California law
5 firm with offices at 650 California Street, Suite 1900, San Francisco, California. I am admitted to
6 practice in the State of California and am also admitted to practice before this Court.

7 2. I submit this declaration in support of the Motion of the Debtors (the “**Motion to**
8 **Shorten**”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy
9 Court for the Northern District of California, for entry of an order shortening time for a hearing on
10 August 25, 2020, at 10:00 a.m. (Prevailing Pacific Time), to consider the *Application of Debtors*
11 *Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014(a) and 2016 and the Court’s Order*
12 *Authorizing the Debtors to Employ Professionals Used in the Ordinary Course of Business for*
13 *Authority to Retain and Employ Pillsbury Winthrop Shaw Pittman LLP as Special Counsel for the*
14 *Debtors Effective as of the Petition Date* [Dkt. No. 8676] and the *Application of Debtors Pursuant to*
15 *11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014(a) and 2016 and the Court’s Order Authorizing the*
16 *Debtors to Employ Professionals Used in the Ordinary Course of Business for Authority to Retain*
17 *and Employ Clarence Dyer & Cohen LLP as Special Counsel for the Debtors Effective as of the*
18 *Petition Date* [Dkt. No. 8679] (together, the “**Applications**”). The Debtors request that any
19 responses or objections to the Applications be in writing and filed with the Court and served on
20 counsel for the Debtors so as to be received no later than 4:00 p.m. (Pacific Time) on August 18,
21 2020.

22 3. The Applicants¹ have worked diligently to prepare their Applications as quickly as
23 possible so as to be heard prior to the deadline under the Plan for submission of final fee
24 applications. However, the Applications were unable to be finalized and filed until the date of this
25 filing.

27 ¹ Except as otherwise noted herein, capitalized terms shall have the meanings given to them in the
28 Motion to Shorten.

4. At 1:04 p.m. (Pacific Time) on August 5, 2020, I sent an e-mail to counsel for the United States Trustee (“UST”), the Official Committee of Tort Claimants (“TCC”), and the Official Committee of Unsecured Creditors (“UCC”) regarding the Debtors’ request to shorten time by one day for notice of hearing on the Applications. I sent a follow-up e-mail at 3:54 p.m. (Pacific Time).

5. As of this filing, I have been informed by counsel for the TCC and the UST that those parties have no objection to this request for shortened time. I have not received any response from counsel for the UCC.

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct and that this declaration was executed at Sunnyvale, California, on August 5, 2020.

/s/ Thomas B. Rupp
Thomas B. Rupp